



Edward D. Greim  
edgreim@gravesgarrett.com

April 19, 2021

Hon. Lewis J. Liman  
United States Courthouse  
Courtroom 17A  
500 Pearl Street  
New York, New York 10007

**Re: Eastern Profit Corp. Ltd. v. Strategic Vision US, LLC, Case No. 18-cv-2185 (LJL)-  
DCF/Strategic Vision's Motion to Strike PX-67**

Dear Judge Liman:

Strategic Vision moves to strike admission of PX-67 (New York Times article by David D. Kirkpatrick and Mark Mazzetti entitled "Seeking Foreign Money, G.O.P. Donor Pushed for Trump to Golf With Malaysian Premier"). PX-67 was referenced during Eastern Profit's direct examination of Strategic witness Dr. Michael Waller. PX-67 should be stricken because it is not substantive evidence, is hearsay, was written before the plea agreement entered into by Mr. Broidy came to exist, and does not show the actual charge to which Mr. Broidy pled and was pardoned by President Donald Trump. Nor did Dr. Waller testify he had ever read that article.

Importantly, contrary to the question asked of Dr. Waller, which was based on nothing in the record, the matter to which Mr. Broidy pled was failing to register his lobbying the Trump administration and the Department of Justice on behalf of a *Malaysian national* (not on behalf of the CCP, the PRC, or the Chinese government). See <https://www.wsj.com/articles/gop-fundraiser-elliott-broidy-pleads-guilty-in-case-linked-to-lmdb-fund-11603230489>. Among the Malaysian national's goals was favorable treatment in his own criminal case and, allegedly, the return of Guo Wengui to China. There is no evidence whatsoever that the PRC, let alone the CCP, paid Mr. Broidy for his efforts on behalf of the Malaysian national. Nor is there evidence regarding the actual facts of what Mr. Broidy did, how the Guo matter was raised with him and what he understood he was doing, or of what Strategic Vision understood that Mr. Broidy did when, two years after the relevant events, it agreed to accept litigation funding.

Respectfully submitted,



Edward D. Greim  
Attorney for Defendant/Counterclaimant

cc: Counsel of record via ECF